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September 16, 1998

Gordie Blum
Community Involvement Coordinator
U.S. Environmental Protection Agency
Region 5 - Office of Public Affairs
Community Involvement Section
77 West Jackson Boulevard
Chicago, IL 60604-3590

EPA Region 5 Records Ctr.



207123

Dear Mr. Blum

The companies listed on Attachment A submit the following comments regarding the description and characterization of light, nonaqueous phase liquid (LNAPL) contamination at the Lenz Oil Site included in USEPA's Proposed Plan for further remediation of the Site.¹

The Proposed Plan contains numerous references to the LNAPL layer at the Lenz Oil Site as being "on and within the shallow aquifer" underlying the site, or "present in the shallow aquifer." USEPA appears to suggest that remediation of the LNAPL layer, in effect, constitutes remediation of the aquifer, and therefore remediation of the groundwater.

USEPA's characterization of the LNAPL contamination is incorrect. USEPA is well aware that the LNAPL layer is a separate phase that remains above the water table. Therefore, by definition, the LNAPL layer is not within the aquifer. Remediation of LNAPL-contaminated soil and bedrock, and of the LNAPL layer, as contemplated during Phase 1 of the Proposed Plan, is not groundwater remediation.

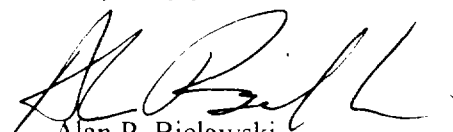
To the extent USEPA's statements to the effect that the LNAPL layer is present in the aquifer are intended to influence or alter the State of Illinois' continuing obligation to complete source removal and non-groundwater remediation activities at the Site, USEPA's statements are

¹ Many of these same parties are submitting additional comments on USEPA's Proposed Plan under separate cover

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inappropriate and objectionable. The Proposed Plan should be corrected to accurately define the LNAPL and the related remedial components.

Very truly yours,



Alan P. Bielawski

APB/gi
attachment

cc Stuart Hersch
Mary Tierney
Susan Horn
Gerald Willman

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ATTACHMENT A

The following parties are Participants in the attached comments to the Proposed Plan at the Lenz Oil Superfund Site:

American National Can
Cardox
Coca Cola Bottling Co.
Chicago Roto Print Co./Krueger Ringier/Ringier America/W.F. Hall Printing
Commonwealth Edison Company
Container Corp. of America
Exolon Esk Co.
Freund Equipment
Henry Valve Company
Lewis University
McGill Manufacturing
Owens Illinois
Penske Trucking
Sears, Roebuck & Company